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*Attorneys for Defendant  
Freeman Expositions, LLC  
Improperly Named The Freeman Company, LLC*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

13 JAMES ROUSHKOLB,  
14 Plaintiff,  
15 vs.  
16  
17 THE FREEMAN COMPANY, LLC, a  
Domestic Corporation;  
18 EMPLOYEE(S)/AGENT(S) DOES I-X; a  
ROE CORPORATIONS XI-XX, Inclusiv  
19  
Defendants.

Case No. 2:19-cv-02084-JCM-NJK

**STIPULATION AND ORDER TO  
EXTEND DEADLINE FOR  
DEFENDANT'S RESPONSE TO  
PLAINTIFF'S COMPLAINT  
(First Request)**

IT IS HEREBY STIPULATED by and between Plaintiff, James Roushkolb ("Plaintiff"), through his counsel The Gabroy Law Offices, and Defendant Freeman Expositions, LLC improperly named as The Freeman Company, LLC ("Defendant"), through its counsel Jackson Lewis P.C., that Defendant shall have up to and including **Tuesday, January 7, 2020**, in which to respond to Plaintiff's Complaint. This Stipulation is submitted and based upon the following:

26           1. That Defendant's answer or response in the Eighth Judicial District Court was due  
27 on December 5, 2019.

28           2. That Defendant filed its Petition for Removal on December 5, 2019. ECF No. 1.

1           3. That this is the first request for an extension of time for Defendant to respond to  
2 Plaintiff's Complaint.

3           4. That such an extension is necessary because defense counsel requires additional  
4 time to investigate facts that will allow for an informed response to the pending Complaint.

5           5. That this request is made in good faith and not for the purpose of delay.

6           6. That nothing in this Stipulation, nor the fact of entering to the same, shall be  
7 construed as waiving any claim and/or defense held by any party.

8           Dated this 9th day of December, 2019.

9           GABROY LAW OFFICES

JACKSON LEWIS P.C.

10          /s/ *Christian Gabroy*

11          Christian Gabroy  
12          Nevada State Bar No. 8805  
13          GABROY LAW OFFICES  
14          The District at Green Valley Ranch  
15          170 South Green Valley Parkway, Suite 280  
16          Henderson, Nevada 89012

17          Attorneys for Plaintiff

/s/ *Lynne K. McChrystal*

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23          Las Vegas, Nevada 89101

24          Attorneys for Defendant

17          **ORDER**

18          IT IS SO ORDERED:

20            
21          United States Magistrate Judge

22          Dated: December 10, 2019

24          4833-7273-2334, v. 1